UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

DISH NETWORK L.L.C. and **NAGRASTAR LLC**, Plaintiffs, v. **DEBRA HENDERSON, JOHN HENDERSON**, and **BOOM MEDIA LLC**, Defendants.	Case No. 5:19-CV-1310 MAD/ATB

PLAINTIFFS' MOTION FOR CERTIFICATE OF ENTRY OF DEFAULT

Pursuant to Fed. R. Civ. P. 55(a) and Local Rule 55.1, Plaintiffs DISH Network L.L.C. and NagraStar LLC ("Plaintiffs") request the Clerk's certificate of entry of default against Defendants Debra Henderson, John Henderson, and Boom Media LLC ("Defendants") and in support state:

1. Defendants John Henderson and Boom Media LLC were properly served with the summons and complaint on October 30, 2019. (Dkts. 10-11; Frank Decl. ¶ 2.) Defendant Debra Henderson was properly served with the summons and complaint on October 31, 2019. (Dkt. 12; Frank Decl. ¶ 3.)

2. On December 4, 2019, the Court granted Defendants' first request for extension of time to respond to the complaint, making the response deadline December 9, 2019. (Dkt. 15.)

3. On December 13, 2019, the Court granted Defendants' second request for extension of time to respond to the complaint, making the response deadline December 24, 2019. (Dkt. 17.)

4. Defendants have not answered or otherwise responded to the complaint as provided for in the Federal Rules of Civil Procedure. (Frank Decl. ¶ 5.)

5. Defendants are not infants, not incompetent, and not on active duty in the United

States military or otherwise exempted under the Servicemembers' Civil Relief Act. (*Id.* at ¶¶ 6-10, Exs. 1-4.)

Accordingly, the Clerk should issue a certificate of entry of default against Defendants.

Dated: December 27, 2019

Respectfully submitted,

s/ Timothy M. Frank
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CERTIFICATE OF SERVICE

I certify that on December 27, 2019 the foregoing motion was served on Defendants Debra Henderson, John Henderson, and Boom Media LLC by mailing a copy to the address where each Defendant was served with Plaintiffs' summons and complaint.

Aleksandra Ames